

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMES FERMAN CHATMAN,

Defendant.

INDICTMENT

18 U.S.C. § 1591(a)(1); (a)(2); (b)(1); &  
(b)(2)

18 U.S.C. § 2260A

The Grand Jury charges that

**COUNT I**  
**(Sex Trafficking of a Minor or by Force)**

Between on or about September 21, 2021, and on or about September 25, 2021, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, JAMES FERMAN CHATMAN, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain MINOR VICTIM 1, having had a reasonable opportunity to observe MINOR VICTIM 1, and knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old, and knowing and in reckless disregard that MINOR VICTIM 1 would be caused to engage in a commercial sex act, and knowing and in reckless disregard that means of force, threats of force, fraud, and coercion would be used to cause MINOR VICTIM 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a)(1); (b)(1); and (b)(2).

**COUNT II**  
**(Sex Trafficking of a Minor or by Force – Financial Benefit)**

Between on or about September 21, 2021, and on or about September 25, 2021, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, JAMES

FERMAN CHATMAN, did knowingly benefit financially or receive anything of value from participation in a venture in which MINOR VICTIM 1 was recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited to engage in a commercial sex act, knowing and in reckless disregard that MINOR VICTIM 1 was under the age of 18 years old, and knowing and in reckless disregard that means of force, threats of force, fraud, and coercion would be used to cause MINOR VICTIM 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a)(2); (b)(1); and (b)(2).

**COUNT III**  
**(Sex Trafficking by Force)**

Between on or about November 6, 2021, and on or about November 21, 2021, in the District of Nebraska and elsewhere, the defendant, JAMES FERMAN CHATMAN, knowingly, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain VICTIM 2, knowing that means of force, threats of force, fraud, and coercion would be used to cause VICTIM 2 to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

**COUNT IV**  
**(Sex Trafficking by Force – Financial Benefit)**

Between on or about November 6, 2021, and on or about November 21, 2021, in the District of Nebraska and elsewhere, in and affecting interstate commerce, the defendant, JAMES FERMAN CHATMAN, did knowingly benefit financially or receive anything of value from participation in a venture in which VICTIM 2 was recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited to engage in a commercial

sex act, knowing and in reckless disregard that means of force, threats of force, fraud, and coercion would be used to cause VICTIM 2 to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a)(2) and (b)(1).

**COUNT V**

**(Offense against a Minor by Person Required to Register as a Sex Offender)**

Between on or about September 21, 2021, and on or about September 25, 2021, in the District of Nebraska, the defendant, JAMES FERMAN CHATMAN, an individual required by law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 1591, as charged in Count I of this Indictment.

In violation of Title 18, United States Code, Section 2260A.

**COUNT VI**

**(Offense against a Minor by Person Required to Register as a Sex Offender)**

Between on or about September 21, 2021, and on or about September 25, 2021, in the District of Nebraska, the defendant, JAMES FERMAN CHATMAN, an individual required by law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 1591, as charged in Count II of this Indictment.

In violation of Title 18, United States Code, Section 2260A.

**FORFEITURE ALLEGATION**

1. The allegations contained in Counts I through IV of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d).

2. Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of 18 U.S.C. § 1591, the defendant, JAMES FERMAN CHATMAN, shall forfeit to the United States:

- a. any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense; and

- b. any property, real or personal, constituting or derived from, any proceeds that the defendant obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

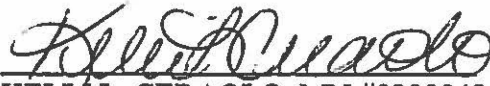
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant JAMES FERMAN CHATMAN up to the value of said property listed above as being subject to forfeiture.

Criminal forfeiture, in violation of Title 18, United States Code, Section 1594.

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FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
KELLI L. CERAOLO, MN #0398049  
Assistant U.S. Attorney